

**LAGOMARSINO LAW**

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**UNITED STATES DISTRICT COURT****CLARK COUNTY, NEVADA**

TRINITA FARMER, individually,  
  
 Plaintiff,

v.

LAS VEGAS METROPOLITAN POLICE  
 DEPARTMENT, a political subdivision of the  
 State of Nevada; KENNETH LOPERA,  
 individually; TRAVIS CRUMRINE,  
 individually; MICHAEL TRAN, individually;  
 MICHAEL FLORES, individually,  
  
 Defendants.

CASE NO.: 2:18-cv-00860-GMN-VCF

**STIPULATION AND ORDER TO EXTEND**  
**JOINT PRETRIAL ORDER DEADLINE**

*(First Request)*

Pursuant to LR IA 6-1, Plaintiff TRINITA FARMER and Defendants LAS VEGAS METROPOLITAN POLICE DEPARTMENT, KENNETH LOPERA, TRAVIS CRUMRINE, MICHAEL TRAN, and MICHAEL FLORES (“Parties”), by and through their respective counsel of record, hereby stipulate and request that this Court extend the current deadline to file the Joint Pretrial Order (“JPTO”) in the above-captioned case by fifty-six (56) calendar days, up to and including November 8, 2021. This Stipulation is the first request to extend the pretrial order deadline in this case.

WHEREAS, pursuant to the Court’s order dated September 28, 2020 (ECF No. 173), the Parties’ deadline to file the JPTO was set for October 28, 2020.

...

1 WHEREAS Defendant LOPERA filed his *Notice of Appeal* on October 12, 2020 (ECF No.  
2 174), placing the Parties' JPTO deadline on hold.

3 WHEREAS the United States Court of Appeals for the Ninth Circuit issued its *Mandate*  
4 regarding LOPERA's appeal on August 13, 2021, re-setting the Parties' JPTO deadline to  
5 September 13, 2021.

6 WHEREAS the Parties have agreed to a mediate this matter on October 7, 2021.

7 WHEREAS Plaintiff's counsel has a two to three (2-3) week trial beginning on August 26,  
8 2021 in the Eighth Judicial District Court.

9 WHEREAS the good cause reasons for the requested extension are as follows:

10 (1) The Parties want to limit fees and costs prior to the mediation set for October 7, 2021  
11 and therefore, request this extension to move the JPTO to thirty (30) days after the mediation; and

12 (2) Plaintiff's counsel will need to devote the appropriate amount time to the analysis of  
13 the matters within, and drafting of, the JPTO. Counsel will be unable to do so before the current  
14 deadline due to his trial beginning on August 26, 2021.

15 FURTHERMORE, the parties agree to the following deadlines:

- 16 • The Parties will disclose proposed exhibits on October 14, 2021;
- 17 • The Parties will serve objections to the proposed exhibits on October 21, 2021;
- 18 • The Parties will exchange language to be incorporated in the JPTO on October 28, 2021;
- 19 • The Parties will conduct a telephone conference on November 4, 2021 to discuss final  
20 language to be incorporated into the JPTO and any remaining issues. Should the parties  
21 not agree on the final language in the Pretrial Order, the parties have agreed to file  
22 individual Pretrial Orders;
- 23 • The parties agree to identify potential deposition transcript designations of unavailable  
24 witnesses forty-five (45) days before trial. Objections to a party's designations and any  
25 counter-designations will be served thirty (30) days before trial.

- The parties will file the JPTO by November 8, 2021.

This extension is made in good faith and is not intended for purposes of delay.

**IT IS SO STIPULATED AND AGREED.**

DATED this 16<sup>th</sup> day of August, 2021.

DATED this 16<sup>th</sup> day of August, 2021.

**LAGOMARSINO LAW**

**MARQUIS AURBACH COFFING**

/s/ Andre M. Lagomarsino  
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*Attorney for Defendants LVMPD,  
Crumrine, Tran, and Flores*

DATED this 16<sup>th</sup> day of August, 2021.

**MCNUTT LAW FIRM, P.C.**

/s/ Matthew C. Wolf  
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*Attorneys for Defendant Lopera*

**ORDER**

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

Dated: 8-17-2021

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